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12 UNITED STATES DISTRICT COURT
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14 NORTHERN DISTRICT OF CALIFORNIA
15
16 SAN FRANCISCO DIVISION

17 NATIONAL TPS ALLIANCE, *et al.*,

18 Case No. 3:25-cv-1766

19 Plaintiff,

20 v.

21 KRISTI NOEM, in her official capacity as
22 Secretary of Homeland Security, *et al.*,

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28 **DEFENDANTS' NOTICE OF PROPOSED
SEARCH TERMS, CUSTODIANS, AND DATES
Re: ECF No. 364**

Defendants.

DEFS.' DEFENDANTS' NOTICE OF PROPOSED SEARCH TERMS, CUSTODIANS, AND DATES
[RE: ECF No. 364]– No. 3:25-cv-1766

On January 15, 2026 at or around 11:28am Pacific Time, Plaintiffs filed a Joint Discovery Letter Brief with the Court to which they appended Exhibit B, a Summary of Proposals Regarding Custodians, Dates and Search Terms. ECF No. 364, 364-2. This joint filing did not attach Defendants' most up-to-date summary of proposals.

Defendants write to notify the Court that they provided additional counter-proposals to Plaintiffs while the Parties worked to draft the Joint Discovery Letter. The most current version of Defendants' counter-proposals, including some additional stipulations as to custodians for RFP Set One, are appended to this Notice for the Court's consideration.

Dated: January 15, 2026

Respectfully submitted,

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DEFS.' DEFENDANTS' NOTICE OF PROPOSED SEARCH TERMS, CUSTODIANS, AND DATES
[RE: ECF No. 364]– No. 3:25-cv-1766

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2 *Attorneys for the Defendants*
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CERTIFICATE OF SERVICE

I hereby certify that on January 15, 2026, I caused the foregoing to be electronically filed with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all counsel of record.

/s/ Eric M. Snyderman
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